

No. PD-0553-20
In the
Texas Court of Criminal Appeals
At Austin

FILED
COURT OF CRIMINAL APPEALS
11/23/2020
DEANA WILLIAMSON, CLERK

—◆—
No. 01-18-00897-CR
In the Court of Appeals for the
First District of Texas
At Houston

—◆—
No. 1532340
In the 178th District Court
Of Harris County, Texas

—◆—
JAMAILE JOHNSON
Appellant
V.
THE STATE OF TEXAS
Appellee
—◆—

—◆—
STATE'S FIRST MOTION FOR EXTENSION OF TIME TO FILE
BRIEF
—◆—

TO THE HONORABLE COURT OF CRIMINAL APPEALS:

THE STATE OF TEXAS, pursuant to Tex. R. App. P. 10.1 and 10.5(b),
moves for an extension of time within which to file the State's brief on
discretionary review. In support of its motion, the State submits the following:

1. This Court granted the State's petition for discretionary review on
October 21, 2020.
2. The State's brief is due on November 20, 2020.

3. The following facts are relied upon to show good cause for the requested extension:
- i. This is the State's first request for an extension of time to file its brief.
 - ii. The undersigned attorney has been responsible for the following projects since this Court granted the State's petition for discretionary review:
 - a. Jamaile Johnson v. State of Texas
PD-0553-20
State's response to appellant's motion for bail pending appeal submitted: November 20, 2020
 - b. Eric Anderson v. State of Texas
No. 14-20-00139-CR
State brief due: November 20, 2020
 - c. Robert Jones v. State of Texas
No. 14-20-00242-CR
State brief due: December 4, 2020
 - d. In the Matter of T.V.T.
No. 14-18-00807-CV
Appellant's supplemental brief due: December 7, 2020
 - iii. The undersigned attorney has had to conduct legal research to assist prosecutors with questions regarding cases currently pending in the trial courts. Such additional work has interfered with the undersigned attorney's ability to complete the State's brief in this case.
 - iv. Until November 9, 2020, the undersigned attorney was the only caregiver to her two very young children during the times the undersigned attorney's spouse was working, due to the coronavirus pandemic.

- v. The undersigned attorney will be unable to work on the State's brief over the upcoming Thanksgiving holiday.
- 4. This motion for extension is not made for purposes of delay, but that the issues in this case can be addressed completely and properly in briefing to this Court.

WHEREFORE, the State prays that this Court will grant an extension of time to Monday, December 14, 2020, for the undersigned attorney to complete and file the State's brief on discretionary review.

Respectfully submitted,

/s/ Patricia McLean

PATRICIA MCLEAN

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CERTIFICATE OF SERVICE

This is to certify that a copy of the foregoing instrument will be sent by e-filing to:

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Date: November 20, 2020

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Associated Case Party: State of Texas

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Stacey Soule	24031632	information@spa.texas.gov	11/20/2020 3:56:15 PM	SENT

Associated Case Party: Jamaile Johnson

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